

Filed Under Seal

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 25-42

v. : DATE FILED:

SAAHIR IRBY : VIOLATIONS:
TAUHEED TUCKER : 18 U.S.C. § 371 (conspiracy to steal
CORY SCOTT : government funds – 1 count)
ALEXANDER TELEWODA : 18 U.S.C. § 641 (theft of government
: funds – 1 count)
: 18 U.S.C. § 1708 (mail theft – 2 counts)
: 18 U.S.C. § 2 (aiding and abetting)
Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The United States Department of the Treasury, Bureau of the Fiscal Service (“BFS”), was responsible for printing and mailing United States Treasury checks to individuals and businesses throughout the United States. These Treasury checks represented payments from a large number of federal agencies and included, among many other payments, income tax refunds from the Internal Revenue Service (“IRS”), social security benefit payments from the Social Security Administration, and veterans benefit payments from the Department of Veterans Affairs. One program that generated particularly large payments via Treasury check during and shortly after the COVID-19 pandemic was the Employee Retention Credit, a refundable tax credit offered by the IRS that provided financial relief to compensate employers for not laying off employees during the pandemic.

2. BFS operated a facility in Philadelphia, Pennsylvania from which Treasury checks were mailed on a daily basis to individuals and businesses around the United States. Treasury checks that were mailed out by BFS but were undeliverable to the intended recipient for any reason were marked “Return to Sender” and were sent back to BFS’s Philadelphia facility via the United States Postal Service (“USPS”).

3. Treasury checks mailed from, or returned to, BFS’s Philadelphia facility were processed at the USPS Philadelphia Processing and Distribution Center (“P&DC”).

4. Defendant SAAHIR IRBY and defendant TAUHEED TUCKER were cousins, and were both employed by USPS at the Philadelphia P&DC. Both defendant IRBY and defendant TUCKER worked as Mail Processing Clerks to sort mail passing through the facility. In their role as Mail Processing Clerks, both defendant IRBY and defendant TUCKER had physical access to mail sorting machines that processed mail sent from and being delivered to BFS’s Philadelphia facility.

5. From in or about June 2023 to on or about September 11, 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**SAAHIR IRBY,
TAUHEED TUCKER,
CORY SCOTT, and
ALEXANDER TELEWODA**

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to steal and knowingly convert to their own use a thing of value of the United States in an amount over \$1,000, in violation of Title 18, United States Code, Section 641.

MANNER AND MEANS

It was part of the conspiracy that:

6. While on duty at the Philadelphia P&DC, defendant SAAHIR IRBY identified mail sorting machines which, at certain times of day, processed large numbers of envelopes containing Treasury checks. Defendant IRBY focused in particular on machines processing Treasury checks that had been marked “Return to Sender” and were being returned to BFS’s Philadelphia facility in zip code 19115.

7. While other USPS employees responsible for manning these specific sorting machines stepped away from the machines on break, defendant SAAHIR IRBY and defendant TAUHEED TUCKER approached the sorting machines and removed large numbers of envelopes containing Treasury checks from the mail bins to which these envelopes had been sorted. Without opening the envelopes, defendant IRBY and defendant TUCKER concealed the envelopes in a sweatshirt and jacket pocket, and in backpacks, and left the area. Defendant IRBY and defendant TUCKER then carried the envelopes containing Treasury checks out of the Philadelphia P&DC and placed the envelopes in their respective vehicles, either during or at the end of their shifts.

8. Defendant SAAHIR IRBY and defendant TAUHEED TUCKER delivered the Treasury checks that they had stolen from the Philadelphia P&DC to defendant CORY SCOTT and defendant ALEXANDER TELEWODA. Defendant SCOTT and defendant TELEWODA collected these stolen Treasury checks in bulk (sometimes hundreds of checks at a time) from defendant IRBY and defendant TUCKER on a regular basis and paid defendant IRBY and defendant TUCKER for the stolen Treasury checks, either in cash or via a peer-to-peer mobile payment system such as CashApp and Apple Cash.

9. Once in possession of the stolen Treasury checks, defendant CORY SCOTT and defendant ALEXANDER TELEWODA advertised the checks for resale on the cloud-based instant messaging application Telegram.

10. Defendant CORY SCOTT served as an administrator of the Telegram channel SWIPESLAB, and beginning in or about March 2024, defendant SCOTT also served as an administrator of the Telegram channel STIM LORD. Defendant ALEXANDER TELEWODA served as an administrator of the Telegram channel THE FRANCHISE.

11. Defendant CORY SCOTT and defendant ALEXANDER TELEWODA used these three Telegram channels—SWIPESLAB, STIM LORD, and THE FRANCHISE—for the purpose of reselling the Treasury checks that they obtained from defendant SAAHIR IRBY and defendant TAUHEED TUCKER to interested purchasers around the United States who then deposited the checks for their own monetary gain, without the permission of the persons to whom the Treasury checks had originally been issued. To attract buyers, defendant SCOTT and defendant TELEWODA posted on Telegram images of individual Treasury checks offered for sale, as well as images showing large piles of envelopes containing Treasury checks. Defendant SCOTT and defendant TELEWODA also posted advertisements without check images, in which they referenced specific dollar amounts, which correlated with the face value of the Treasury checks that defendant SCOTT and defendant TELEWODA were offering for sale. Defendant SCOTT and defendant TELEWODA instructed interested buyers to send them a private message via Telegram to coordinate a sale.

12. When purchasers sent the agreed-upon payment to defendant CORY SCOTT and defendant ALEXANDER TELEWODA (often 10% of the face value of a stolen Treasury check), defendant SCOTT and defendant TELEWODA mailed the stolen Treasury

check to the purchaser so the purchaser could cash and/or deposit the check.

13. Between in or about June 2023 and on or about September 11, 2024, when defendant SAAHIR IRBY's and defendant TAUHEED TUCKER's access to the Philadelphia P&DC was suspended, defendant IRBY and defendant TUCKER sold to defendant CORY SCOTT and defendant ALEXANDER TELEWODA thousands of stolen Treasury checks whose total face value exceeded \$80 million. Defendant SCOTT's and defendant TELEWODA's customers successfully negotiated hundreds of these stolen Treasury checks at financial institutions, leading to a loss to the United States of approximately \$11 million.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants SAAHIR IRBY, TAUHEED TUCKER, CORY SCOTT, and ALEXANDER TELEWODA, together and with others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

On or about June 13, 2023:

1. Defendant CORY SCOTT and defendant SAAHIR IRBY exchanged messages via Telegram in which defendant IRBY sent defendant SCOTT an image reflecting a large stack of envelopes containing Treasury checks. Defendant SCOTT and defendant IRBY then arranged to meet to exchange the Treasury checks that defendant IRBY had stolen for payment from defendant SCOTT.

2. Defendant ALEXANDER TELEWODA sent defendant SAAHIR IRBY two payments—one for \$300 and one for \$1800—via CashApp.

3. On or about June 25, 2023, defendant CORY SCOTT exchanged messages via Telegram with a potential purchaser of Treasury checks in which he offered to sell

two checks for \$350 and instructed the purchaser to send the payment to defendant SCOTT's CashApp account.

On or about June 28, 2023:

4. Defendant CORY SCOTT posted images of three stolen Treasury checks to the SWIPESLAB Telegram channel. All three checks were made out to a painting company in King of Prussia, Pennsylvania, and the face value of the checks totaled approximately \$408,853.

5. Defendant CORY SCOTT and defendant ALEXANDER TELEWODA exchanged messages via Telegram containing photographs of Treasury checks and discussing the resale of those checks.

On or about June 30, 2023:

6. Defendant CORY SCOTT and defendant ALEXANDER TELEWODA exchanged messages via Telegram containing photographs of Treasury checks and discussing addresses to which these checks should be sent.

7. Defendant CORY SCOTT mailed at least one stolen Treasury check to a purchaser in Crosby, Texas via USPS.

8. On or about August 8, 2023, defendant CORY SCOTT and defendant SAAHIR IRBY exchanged messages via Telegram discussing how to get defendant TAUHEED TUCKER—defendant IRBY's cousin—involved in the Treasury check theft scheme.

9. On or about September 16, 2023, defendant TAUHEED TUCKER sent defendant SAAHIR IRBY a Telegram message while defendant TUCKER was on duty at the Philadelphia P&DC, reflecting a photograph of several envelopes containing Treasury checks.

10. On or about September 20, 2023, defendant CORY SCOTT and defendant SAAHIR IRBY exchanged messages via Telegram while defendant IRBY was on duty at the

Philadelphia P&DC, confirming that defendant IRBY had stolen checks from the Philadelphia P&DC and was planning to meet with defendant SCOTT so that defendant IRBY could hand off these checks to defendant SCOTT.

On or about November 18, 2023:

11. While on duty at the Philadelphia P&DC, defendant TAUHEED TUCKER stole envelopes containing Treasury checks that were marked Return to Sender and were being delivered to BFS's facility in Philadelphia. These envelopes had been processed by Delivery Bar Code Sorter ("DBCS") machine number 22 at the Philadelphia P&DC.

12. Defendant CORY SCOTT sent defendant SAAHIR IRBY a \$500 payment via CashApp.

On or about November 19, 2023:

13. Defendant CORY SCOTT posted an image of a large stack of envelopes containing Treasury checks, all marked Return to Sender, to the SWIPESLAB Telegram channel.

14. Defendant CORY SCOTT sent defendant SAAHIR IRBY a \$1,500 payment via CashApp.

15. On or about November 22, 2023, defendant CORY SCOTT sent defendant TAUHEED TUCKER a \$600 payment via Apple Cash.

On or about February 25, 2024:

16. While on duty at the Philadelphia P&DC, defendant SAAHIR IRBY stole envelopes containing Treasury checks that were marked Return to Sender and were being returned to BFS's facility in Philadelphia. These envelopes had been processed by DBCS machine number 22 at the Philadelphia P&DC.

17. Defendant CORY SCOTT posted an image of a large stack of envelopes containing Treasury checks marked Return to Sender to the SWIPESLAB Telegram channel.

18. On or about March 3, 2024, while on duty at the Philadelphia P&DC, defendant SAAHIR IRBY stole envelopes containing Treasury checks. These envelopes had been processed by DBCS machine number 22 at the Philadelphia P&DC.

19. On or about March 4, 2024, defendant CORY SCOTT posted an image of a large stack of envelopes containing Treasury checks to the SWIPESLAB Telegram channel.

On or about May 5, 2024:

20. While on duty at the Philadelphia P&DC, defendant TAUHEED TUCKER stole envelopes containing Treasury checks. These envelopes had been processed by DBCS machine number 22 at the Philadelphia P&DC.

21. While on duty at the Philadelphia P&DC, defendant SAAHIR IRBY also stole envelopes containing Treasury checks. These envelopes had been processed by DBCS machine number 22 at the Philadelphia P&DC.

22. Defendant CORY SCOTT sent defendant SAAHIR IRBY two payments via Apple Cash, for \$1000 each.

23. Defendant CORY SCOTT posted an image to the STIM LORD Telegram channel depicting what appeared to be a pile of envelopes, with the caption, "DO NOT TEXT US PLEASE GO LOAD UP.....DROPPING MONDAY."

24. On or about May 26, 2024, defendant CORY SCOTT advertised on the STIM LORD Telegram channel that he was selling a \$50,000 check for 10% of its face value,

with instructions that interested purchasers should send him a message via Telegram to inquire further.

25. On or about August 16, 2024, defendant ALEXANDER TELEWODA posted an image of four stolen Treasury checks to THE FRANCHISE Telegram channel, with instructions that interested purchasers should send him a message via Telegram to inquire further. The face value of these four checks totaled approximately \$88,133.

On or about August 18, 2024:

26. While on duty at the Philadelphia P&DC, defendant SAAHIR IRBY stole envelopes containing Treasury checks. These envelopes had been processed by DBCS machine number 22 at the Philadelphia P&DC.

27. Defendant SAAHIR IRBY and defendant CORY SCOTT met in Philadelphia. Defendant IRBY sold defendant SCOTT Treasury checks, and the same day, defendant SCOTT posted a large pile of envelopes appearing to contain Treasury checks to the STIM LORD Telegram channel.

28. On or about September 5, 2024, defendant ALEXANDER TELEWODA posted a message to THE FRANCHISE Telegram channel, advertising checks for sale in the amount of approximately \$50,000, and instructing interested purchasers to send him a message via Telegram to inquire further.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 and 6 through 13 and the overt acts of Count One are incorporated here.
2. From in or about June 2023 to on or about September 11, 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**SAAHIR IRBY,
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embezzled, stole, purloined, and knowingly converted to their own use, and aided and abetted the same, a thing of value of the United States in an amount over \$1,000, that is, United States Treasury checks, which defendant IRBY and defendant TUCKER had stolen from the United States Postal Service Philadelphia Processing and Distribution Center where defendant IRBY and defendant TUCKER were employed.

In violation of Title 18, United States Code, Sections 641 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 and 6 through 13 and the overt acts of Count One are incorporated here.
2. From in or about June 2023 through on or about September 11, 2024, in the Eastern District of Pennsylvania and elsewhere, defendants

**SAAHIR IRBY,
TAUHEED TUCKER,
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knowingly received, concealed, and unlawfully possessed, and aided and abetted the same, one or more items of United States mail, and one or more articles and things contained therein, which had been stolen, taken, and abstracted from a post office, and station thereof, that is, United States Treasury checks, which defendant IRBY and defendant TUCKER had stolen from the United States Postal Service Philadelphia Processing and Distribution Center where defendant IRBY and defendant TUCKER were employed.

In violation of Title 18, United States Code, Sections 1708 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 and 6 through 13 and the overt acts of Count One are incorporated here.
2. On or about August 4, 2024, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAAHIR IRBY

knowingly stole, took, and abstracted United States mail from a post office, and station thereof, that is, defendant IRBY stole approximately 112 pieces of mail containing United States Treasury checks, addressed to various recipients in the Eastern District of Pennsylvania, from the United States Postal Service Philadelphia Processing and Distribution Center where defendant IRBY was employed.

In violation of Title 18, United States Code, Section 1708.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, 641, and 1708, or conspiracy to commit such offenses, as set forth in this indictment, defendants

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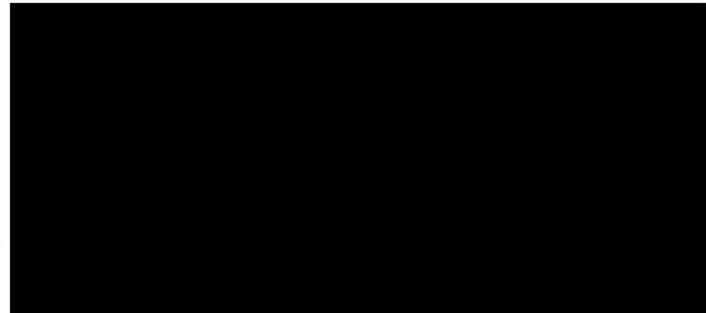
shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).



Christine E. Ayers, Esq.

DAVID METCALF
UNITED STATES ATTORNEY

No. -----

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania
Criminal Division

THE UNITED STATES OF AMERICA

vs.

SAAHIR IRBY
TAUHEED TUCKER
CORY SCOTT
ALEXANDER TELEWODA

SUPERSEDING INDICTMENT

Counts

18 U.S.C. § 371 (conspiracy to steal government funds – 1 count)

18 U.S.C. § 641 (theft of government funds – 1 count)

18 U.S.C. § 1708 (mail theft – 2 counts)

